

# **EXHIBIT D**

# **EXHIBIT 51**

# **REDACTED VERSION**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3

4 CISCO SYSTEMS, INC.,

5 Plaintiff,

6 vs.

7 ARISTA NETWORKS, INC.,

Case No.

8 Defendant.

5:14-cv-5344-BLF

9  
10  
11  
12 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

13 SUBJECT TO PROTECTIVE ORDER  
14

15 VIDEOTAPED DEPOSITION OF ADAM SWEENEY,

16 VOLUME I  
17

18 January 29, 2016

19 9:32 a.m. - 6:48 p.m.  
20

21 555 Twin Dolphin Drive, 5th Floor

22 Redwood Shores, California

23 REPORTED BY:

24 James Beasley

25 CSR No. 12807, CCR No. 835, RPR

1 CLI than the CLI of other companies?

2 A. That that's why they should buy our  
3 equipment, no.

4 Q. Okay.

5 MR. PAK: Let's take our next break.

6 THE VIDEOGRAPHER: This marks the end of  
7 DVD 2. Off the record. The time is 2:33 p.m.

8 (Recess taken at 2:33 p.m.)

9 THE VIDEOGRAPHER: On the record. This  
10 marks the beginning of DVD 3 in the deposition of  
11 Adam Sweeney on January 29th, 2016. The time is  
12 2:49 p.m.

13 Please continue.

14 BY MR. PAK:

15 Q. Mr. Sweeney, based on your experience  
16 working with CLI command syntax both at Cisco and at  
17 Arista, would you agree that coming up with CLI  
18 syntax for a particular command is very subjective?

19 A. It certainly is subjective, yes.

20 Q. And that means that different engineers  
21 could come up with different ideas for the proper  
22 CLI syntax for the same functionality, correct?

23 A. Yes.

24 Q. Okay. In fact, you recall having debates  
25 with engineers at Cisco and later with engineers at

1 Arista about the proper syntax for a CLI command,  
2 true?

3 A. Well, I recall very little about this at  
4 Cisco. But I've certainly had discussions about  
5 what they -- what makes for a good functional  
6 command syntax, yes.

7 Q. Okay. And so if we just focus on your  
8 time at Arista, you would agree that you've had  
9 debates among engineers at Arista about what the  
10 proper syntax for a CLI command should be, true?

11 A. I think "debates" is perhaps a bit strong.

12 Q. You would agree with me that at Arista  
13 you've had discussions among engineers at Arista  
14 where different engineers expressed different  
15 preferences for a CLI command syntax to be  
16 implemented for the same functionality, true?

17 A. Yes.

18 Q. Okay. Sometimes you prevailed in these  
19 discussions, other times other engineers prevailed;  
20 is that true?

21 A. I tend not to look at it as a competition,  
22 just looking for a good answer.

23 Q. All I'm saying is sometimes your -- your  
24 proposal was adopted for a CLI syntax and other  
25 times someone else's proposal for a CLI syntax was

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1 A. It does say that.

2 Q. But you said:

3 "...like most of our rules at Arista,  
4 even this one is open to using your  
5 judgment,"  
6 as engineers, correct?

7 A. Yes.

8 Q. So at the end of the day, all of this is a  
9 judgment call; is that true, in terms of --

10 A. This document is called "guidelines," not  
11 laws.

12 Q. Right. So at the end of the day,  
13 selecting CLI syntax is a judgment call, true?

14 A. Yes.

15 Q. And what you were laying out are some of  
16 the principals and style guidelines; but as you  
17 said, these aren't mandatory rules, at the end of  
18 the day, the Arista engineers should talk about it  
19 and then use their judgment; is that right?

20 A. Yes.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]